

EXHIBIT 39

1 Teresa Li (Bar No. 278779)
2 teresa@lawofficesofteresali.com
3 LAW OFFICES OF TERESA LI, PC
315 Montgomery Street, 9th Floor
4 San Francisco, California 94104
Telephone: 415.423.3377
Facsimile: 888.646.5493

5 Attorneys for Plaintiffs
6 RUBEN JUAREZ and ISELA HERNANDEZ

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10
11 RUBEN JUAREZ, an individual and
12 ISELA HERNANDEZ, an individual

13 Plaintiffs,

14 v.

15 PRECISION VALVE & AUTOMATION,
Inc., a corporation and DOES 1-20

16 Defendants.

Case No. 2:17-cv-03342-ODW-GJS

PLAINTIFFS' INITIAL DISCLOSURES

17
18 Come now Plaintiffs RUBEN JUAREZ, and ISELA HERNANDEZ, pursuant to Federal
19 Rule of Civil Procedure §26(a)(1) make the following initial disclosures:

20 1. **Witnesses**

- 21 a. Ruben Juarez who may testify as to the liability and damages of the case;
22 b. Isela Hernandez who may testify as to the liability and the damages of the
23 case;
24 c. John Pena of Space X who was Plaintiff's manager may testify as to the
25 liability and the damages of the case;
26 d. Heather Lord of Space X who was Plaintiff's HR dedicated to Plaintiff's
27 case may testify as to the liability and the damages of the case;
28 e. Mike Lynch of Space X's HR director who may testify as to the liability

1 and the damages of the case;

2 f. Jane Malubag of Space X who may testify as to the liability of the case;

3 g. Diane Prins of Space X who may testify as to the liability of the case;

4 h. Gregory Maxell of Space X who may testify as to the liability of the case;

5 i. Steven Schenkel MD of 116 N. Robertson Blvd. #806, Los Angeles, CA

6 90048 who may testify as to the liability and the damage of the case;

7 j. Joseph Chambers, M.D. of Facey who may testify as to the liability and the
8 damages of the case;

9 k. Shendee Teng, MD of Providence Holy Cross Medical Center who may
10 testify as to the liability and the damages of the case;

11 l. Fung-Chuan Ara G. Tilkian MD of Providence Holy Cross Medical Center
12 who may testify as to the liability and the damages of the case;

13 m. Daniel Belayneh MD who may testify as to the liability and the damages of
14 the case

15 n. Albert Ko MD of Facey who may testify as to the liability and the damages
16 of the case;

17 o. Kim Grace MD of Facey who may testify as to the liability and the
18 damages of the case;

19 p. Kevin Vuong, MD of Facey who may testify as to the liability and the
20 damages of the case

21 q. Herrera-Espinoza Haydee MD of Facey who may testify as to the liability
22 and the damages of the case;

23 r. Tam Te MD of Facey who may testify as to the liability and the damages
24 of the case;

25 s. Palmer MD of Dignity Health Northridge Hospital who may testify as to
26 the liability and the damages of the case;

27 t. DeLa Lama MD of Dignity Health Northridge Hospital who may testify as
28

1 to the liability and the damages of the case;

2 u. Marcel Maya MD of Cedars Sinai who may testify as to the liability and
3 the damages of the case

4 v. Asma M. Moheet MD of Cedars Sinai who may testify as to the liability
5 and the damages of the case;

6 w. Michael J. Alexander MD of Cedars Sinai who may testify as to the
7 liability and the damages of the case

8 x. Ashish D. Patel MD of Cedars Sinai who may testify as to the liability and
9 the damages of the case;

10 y. Penelope G. Kornbluth RN of Cedars Sinai who may testify as to the
11 liability and the damages of the case;

12 z. Omotola E. Johnson MD of Cedars Sinai who may testify as to the liability
13 and the damages of the case;

14 aa. Michael Alyesh MD of Cedars Sinai who may testify as to the liability and
15 the damages of the case;

16 bb. Karen Altman MD of Cedars Sinai who may testify as to the liability and
17 the damages of the case;

18 cc. Rachel C Pearl MD of Cedars Sinai who may testify as to the liability and
19 the damages of the case;

20 dd. Shlee S. Song of Cedars Sinai who may testify as to the liability and the
21 damages of the case;

22 ee. Marcel Maya MD of Cedars Sinai who may testify as to the liability and
23 the damages of the case;

24 ff. Barry D. Pressman MD of Cedars Sinai who may testify as to the liability
25 and the damages of the case;

26 gg. Shervin Eshaghian, MD of Cedars Sinai who may testify as to the liability
27 and the damages of the case;

28

1 hh. Ronald Lang, MD of Cedars Sinai who may testify as to the liability and
2 the damages of the case;

3 ii. Jay Jurkowitz MD of Cedars Sinai who may testify as to the liability and
4 the damages of the case;

5 jj. Robert D. Sacks MD of Cedars Sinai who may testify as to the liability and
6 the damages of the case

7 kk. Mgngnam MD of Digital Health Northridge Hospital who may testify as to
8 the liability and the damages of the case

9 ll. Susan Kranzpiller MD of Facey who may testify as to the liability and the
10 damages of the case

11 mm. Chris Aghayan MD of Facey who may testify as to the liability and the
12 damages of the case;

13 nn. Donald Downs MD of Facey who may testify as to the liability and the
14 damages of the case;

15 oo. Ravi Prasad of Cedars Sinai who may testify as to the liability and the
16 damages of the case;

17 pp. Mody Cyrus K. MD of Cedars Sinai who may testify as to the liability and
18 the damages of the case;

19 qq. Robert O Ruder MD of Cedars Sinai who may testify as to the liability and
20 the damages of the case;

21 rr. Steven Rudd MD of Cedars Sinai who may testify as to the liability and the
22 damages of the case;

23 ss. Mario Salazar Escudero RN of Cedars Sinai who may testify as to the
24 liability and the damages of the case;

25 tt. Elizabeth Homan RN of Cedars Sinai who may testify as to the liability
26 and the damages of the case;

27 uu. Dayle Robson MD of Cedars Sinai who may testify as to the liability and
28

1 the damages of the case;

2 vv. Bernard Tansman of Cedars Sinai who may testify as to the liability and
3 the damages of the case;

4 ww. James Tourje MD of Cedars Sinai who may testify as to the liability and
5 the damages of the case;

6 xx. Sari M. Cuervo RN of Cedars Sinai who may testify as to the liability and
7 the damages of the case;

8 yy. Gregory Castillo MD of Facey who may testify as to the liability and the
9 damages of the case;

10 zz. David Shaw MD of Facey who may testify as to the liability and the
11 damages of the case;

12 aaa. Anthony J. Loffredo MD of Cedars Sinai who may testify as to the liability
13 and the damages of the case;

14 bbb. Lindsey Christie RN of Cedars Sinai who may testify as to the liability and
15 the damages of the case;

16 ccc. Menahem Maya MD of Cedars Sinai who may testify as to the liability and
17 the damages of the case;

18 ddd. Lana L Milton MD of Cedars Sinai who may testify as to the liability and
19 the damages of the case;

20 eee. Ronald Andiman MD of Cedars Sinai who may testify as to the liability
21 and the damages of the case;

22 fff. Atul Sharma of Facey who may testify as to the liability and the damages
23 of the case;

24 ggg. Lloyd Wagnes of Facey who may testify as to the liability and the damages
25 of the case;

26 hhh. Zack Rassmussen of Cedars Sinai who may testify as to the liability and
27 the damages of the case;

1 iii. Vahe Mooradian MD of Facey who may testify as to the liability and the
2 damages of the case;

3 jjj. Connie Yi Kim RN of Cedars Sinai who may testify as to the liability and
4 the damages of the case;

5 kkk. Alan J Coe MD of Cedars Sinai who may testify as to the liability and the
6 damages of the case;

7 lll. Madhavi Lekkala MD of Facey who may testify as to the liability and the
8 damages of the case;

9 mmm. Douglas Prisco MD of Facey who may testify as to the liability and the
10 damages of the case;

11 nnn. Rabin Nikjoo MD of PHCMC who may testify as to the liability and the
12 damages of the case;

13 ooo. Carrole Lewis RN of PHCMC who may testify as to the liability and the
14 damages of the case;

15 ppp. Gregory Paranay MD of PHCMC who may testify as to the liability and
16 the damages of the case;

17 qqq. Rinka Shiraishi RN of Cedars Sinai who may testify as to the liability and
18 the damages of the case;

19 rrr. Dayle D Robson of Cedars Sinai who may testify as to the liability and the
20 damages of the case;

21 sss. Jaime A Diaz MD of PHCMC who may testify as to the liability and the
22 damages of the case;

23 ttt. Michael Pecoraro RN of PHCMC who may testify as to the liability and
24 the damages of the case

25 uuu. Nichole K Crouch RN of PHCMC who may testify as to the liability and
26 the damages of the case

27 vvv. Christopher Hougen MD of Facey who may testify as to the liability and
28

1 the damages of the case;

2 www. Martin Applebaum of Facey who may testify as to the liability and the
3 damages of the case

4 xxx. Magued Beshay MD of Facey who may testify as to the liability and the
5 damages of the case;

6 yyy. Dharmesh Patel of Facey who may testify as to the liability and the
7 damages of the case

8 zzz. David Shaw MD of Facey who may testify as to the liability and the
9 damages of the case

10 aaaa. Youssef Youssef MD of Facey who may testify as to the liability and the
11 damages of the case

12 bbbb. Kevin Vuong MD of Facey who may testify as to the liability and the
13 damages of the case;

14 cccc. Meredith R D'Anna RN of PHCMC who may testify as to the liability and
15 the damages of the case

16 dddd. Jamie A Diaz MD of PHCMC who may testify as to the liability and the
17 damages of the case

18 eeee. Barry Wilen MD of PHCMC who may testify as to the liability and the
19 damages of the case

20 ffff. Jong Lee MD of Facey who may testify as to the liability and the damages
21 of the case

22 gggg. Daniel Brison MD of Facey who may testify as to the liability and the
23 damages of the case

24 hhhh. Colin W Stokol MD of Cedars Sinai who may testify as to the liability and
25 the damages of the case;

26 iii. Defendant's persons most knowledgeable regarding the design and
27 operation of PVA 350;

28

1 jjjj. Defendant's persons most knowledgeable regarding the chemicals that
2 were going to be sprayed by the PVA 350 at issue;

3 **2. Documents:**

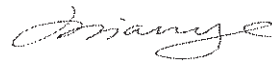
- 4 a. Plaintiff Ruben Juarez's medical records and billing records
5 b. PVA 350 and PVA 650 specifications;
6 c. MSDS sheets;
7 d. Photos of Plaintiffs;
8 e. Plane tickets and trip protection of Plaintiff Isela Hernandez and their
9 daughter;
10 f. Emails of Plaintiff Ruben Juarez
11 g. W2 of Plaintiff Ruben Juarez 2012-2014

12 **3. Damages computation and supporting documents:** Plaintiff Ruben Juarez
13 claims past and future medical costs, past and future wage loss, and pain and suffering. Plaintiff
14 Isela Hernandez claims loss of consortium. The supporting documents will be produced.

15 Plaintiffs retain the right to supplement the disclosure with information learned through
16 discovery.

17
18
19 Dated: August 16, 2017

LAW OFFICES OF TERESA LI, PC



21
22 Teresa Li
23 Attorneys for Plaintiffs
24 RUBEN JUAREZ and ISELA HERNANDEZ
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

State of California, County of San Francisco

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 315 Montgomery Street, 9th Floor, San Francisco, CA 94104.

On the date listed below, I served the following documents: in the manner and/or manners described below to each of the parties herein and addressed as stated below:

• **Plaintiff's Initial Disclosure**

Shahrad Milanfar
smilanfar@bksca.com
Alex P. Catalona
acatalona@bksca.com
BECHERER KANNETT & SCHWEITZER
1255 Powell Street
Emeryville, CA 94608

____ United States Postal Service, U.S. Mail, with First Class postage prepaid and deposited in a sealed envelope at San Francisco, CA. I am readily familiar with the business practice at my place of business for collection and processing of correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business.

____ Facsimile Transmission

____ Hand delivery by Courier: same day delivery

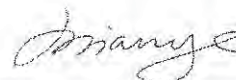
 X Other: E-Mail. pdf attachment

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 16, 2017, at San Francisco, California.

Teresa Li

Type or Print Name



Signature

BALABAN & SPIELBERGER, LLP

11999 San Vicente Blvd., Suite 345

Los Angeles, CA 90049

Tel: (424) 832-7677

Fax: (424) 832-7702

Daniel K. Balaban, SBN 243652

Andrew J. Spielberger, SBN 120231

Kahren Harutyunyan, SBN 298449

LAW OFFICES OF TERESA LI, PC

315 Montgomery Street, 9th Floor

San Francisco, California 94104

Tel: (415) 423-3377

Fax: (888) 646-5493

Teresa Li, SBN 278779

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

RUBEN JUAREZ, an individual and
ISELA HERNANDEZ, an individual

Plaintiffs,

v.

PRECISION VALVE & AUTOMATION,
Inc., a corporation and DOES 1-20

Defendants.

Case No.: 2:17-cv-03342

Honorable Otis D. Wright II.

**PLAINTIFFS' SUPPLEMENTAL
DISCLOSURES PURSUANT TO
FEDERAL RULES OF CIVIL
PROCEDURE 26(a)(1) and 26(e)1**

1 Come now Plaintiffs RUBEN JUAREZ, and ISELA HERNANDEZ,
2 pursuant to Federal Rule of Civil Procedure §26(a)1 and 26(e)1 make the
3 following supplemental disclosures:

4 FRCP 26(a)(1)(A)(i) - The name and, if known, the address and telephone
5 number of each individual likely to have discoverable information - along with the
6 subjects of that information - that the disclosing party may use to support its
7 claims or defenses, unless the use would be solely for impeachment.
8

9 Pursuant to FRCP 26(a)(1)(A)(i), Plaintiffs previously identified the following:

10 Witnesses:

- 11 a. Ruben Juarez who may testify as to the liability and damages of the case;
12 b. Isela Hernandez who may testify as to the liability and the damages of the
13 case;
14 c. John Pena of Space X who was Plaintiff's manager may testify as to the
15 liability and the damages of the case;
16 d. Heather Lord of Space X who was Plaintiff's HR dedicated to Plaintiff's
17 case may testify as to the liability and the damages of the case;
18 e. Mike Lynch of Space X's HR director who may testify as to the liability
19 and the damages of the case;
20 f. Jane Malubag of Space X who may testify as to the liability of the case;
21 g. Diane Prins of Space X who may testify as to the liability of the case;
22 h. Gregory Maxell of Space X who may testify as to the liability of the case;
23 i. Steven Schenkel MD of 116 N. Robertson Blvd. #806, Los Angeles, CA
24 90048 who may testify as to the liability and the damage of the case;
25
26
27
28

1 j. Joseph Chambers, M.D. of Facey who may testify as to the liability and
2 the damages of the case;

3 k. Shendee Teng, MD of Providence Holy Cross Medical Center who may
4 testify as to the liability and the damages of the case;

5 l. Fung-Chuan Ara G. Tilkian MD of Providence Holy Cross Medical Center
6 who may testify as to the liability and the damages of the case;

7 m. Daniel Belayneh MD who may testify as to the liability and the damages
8 of the case

9 n. Albert Ko MD of Facey who may testify as to the liability and the
10 damages of the case;

11 o. Kim Grace MD of Facey who may testify as to the liability and the
12 damages of the case;

13 p. Kevin Vuong, MD of Facey who may testify as to the liability and the
14 damages of the case;

15 q. Herrera-Espinoza Haydee MD of Facey who may testify as to the liability
16 and the damages of the case;

17 r. Tam Te MD of Facey who may testify as to the liability and the damages
18 of the case;

19 s. Palmer MD of Dignity Health Northridge Hospital who may testify as to
20 the liability and the damages of the case;

21 t. DeLa Lama MD of Dignity Health Northridge Hospital who may testify as
22 to the liability and the damages of the case;

1 u. Marcel Maya MD of Cedars Sinai who may testify as to the liability and
2 the damages of the case

3 v. Asma M. Moheet MD of Cedars Sinai who may testify as to the liability
4 and the damages of the case;

5 w. Michael J. Alexander MD of Cedars Sinai who may testify as to the
6 liability and the damages of the case;

7 x. Ashish D. Patel MD of Cedars Sinai who may testify as to the liability and
8 the damages of the case;

9 y. Penelope G. Kornbluth RN of Cedars Sinai who may testify as to the
10 liability and the damages of the case;

11 z. Omotola E. Johnson MD of Cedars Sinai who may testify as to the liability
12 and the damages of the case;

13 aa. Michael Alyesh MD of Cedars Sinai who may testify as to the liability and
14 the damages of the case;

15 bb. Karen Altman MD of Cedars Sinai who may testify as to the liability and
16 the damages of the case;

17 cc. Rachel C. Pearl MD of Cedars Sinai who may testify as to the liability and
18 the damages of the case;

19 dd. Shlee S. Song of Cedars Sinai who may testify as to the liability and the
20 damages of the case;

21 ee. Marcel Maya MD of Cedars Sinai who may testify as to the liability and
22 the damages of the case;

1 ff. Barry D. Pressman MD of Cedars Sinai who may testify as to the liability
2 and the damages of the case;

3 gg. Shervin Eshaghian, MD of Cedars Sinai who may testify as to the liability
4 and the damages of the case;

5 hh. Ronald Lang, MD of Cedars Sinai who may testify as to the liability and
6 the damages of the case;

7 ii. Jay Jurkowitz MD of Cedars Sinai who may testify as to the liability and
8 the damages of the case;

9 jj. Robert D. Sacks MD of Cedars Sinai who may testify as to the liability
10 and the damages of the case;

11 kk. Mgngnam MD of Digital Health Northridge Hospital who may testify as to
12 the liability and the damages of the case;

13 ll. Susan Kranzpiller MD of Facey who may testify as to the liability and the
14 damages of the case;

15 mm. Chris Aghayan MD of Facey who may testify as to the liability and
16 the damages of the case;

17 nn. Donald Downs MD of Facey who may testify as to the liability and the
18 damages of the case;

19 oo. Ravi Prasad of Cedars Sinai who may testify as to the liability and the
20 damages of the case;

21 pp. Mody Cyrus K. MD of Cedars Sinai who may testify as to the liability and
22 the damages of the case;

1 qq. Robert O. Ruder MD of Cedars Sinai who may testify as to the liability
2 and the damages of the case;

3 rr. Steven Rudd MD of Cedars Sinai who may testify as to the liability and
4 the damages of the case;

5 ss. Mario Salazar Escudero RN of Cedars Sinai who may testify as to the
6 liability and the damages of the case;

7 tt. Elizabeth Homan RN of Cedars Sinai who may testify as to the liability
8 and the damages of the case;

9 uu. Dayle Robson MD of Cedars Sinai who may testify as to the liability and
10 the damages of the case;

11 vv. Bernard Tansman of Cedars Sinai who may testify as to the liability and
12 the damages of the case;

13 ww. James Tourje MD of Cedars Sinai who may testify as to the liability
14 and the damages of the case;

15 xx. Sari M. Cuervo RN of Cedars Sinai who may testify as to the liability and
16 the damages of the case;

17 yy. Gregory Castillo MD of Facey who may testify as to the liability and the
18 damages of the case;

19 zz. David Shaw MD of Facey who may testify as to the liability and the
20 damages of the case;

21 aaa. Anthony J. Loffredo MD of Cedars Sinai who may testify as to the
22 liability and the damages of the case;

1 bbb. Lindsey Christie RN of Cedars Sinai who may testify as to the
2 liability and the damages of the case;

3 ccc. Menahem Maya MD of Cedars Sinai who may testify as to the
4 liability and the damages of the case;

5 ddd. Lana L Milton MD of Cedars Sinai who may testify as to the
6 liability and the damages of the case;

7 eee. Ronald Andiman MD of Cedars Sinai who may testify as to the
8 liability and the damages of the case;

9 fff. Atul Sharma of Facey who may testify as to the liability and the damages
10 of the case;

11 ggg. Lloyd Wagnes of Facey who may testify as to the liability and the
12 damages of the case;

13 hhh. Zack Rassmussen of Cedars Sinai who may testify as to the liability
14 and the damages of the case;

15 iii. Vahe Mooradian MD of Facey who may testify as to the liability and the
16 damages of the case;

17 jjj. Connie Yi Kim RN of Cedars Sinai who may testify as to the liability and
18 the damages of the case;

19 kkk. Alan J Coe MD of Cedars Sinai who may testify as to the liability
20 and the damages of the case;

21 lll. Madhavi Lekkala MD of Facey who may testify as to the liability and the
22 damages of the case;

1 mmm. Douglas Prisco MD of Facey who may testify as to the liability and
2 the damages of the case;

3 nnn. Rabin Nikjoo MD of PHCMC who may testify as to the liability and
4 the damages of the case;

5 ooo. Carrole Lewis RN of PHCMC who may testify as to the liability and
6 the damages of the case;

7 ppp. Gregory Paranay MD of PHCMC who may testify as to the liability
8 and the damages of the case;

9 qqq. Rinka Shiraishi RN of Cedars Sinai who may testify as to the
10 liability and the damages of the case;

11 rrr. Dayle D Robson of Cedars Sinai who may testify as to the liability and the
12 damages of the case;

13 sss. Jaime A Diaz MD of PHCMC who may testify as to the liability and
14 the damages of the case;

15 ttt. Michael Pecoraro RN of PHCMC who may testify as to the liability and
16 the damages of the case;

17 uuu. Nichole K Crouch RN of PHCMC who may testify as to the liability
18 and the damages of the case;

19 vvv. Christopher Hougen MD of Facey who may testify as to the liability
20 and the damages of the case;

21 www. Martin Applebaum of Facey who may testify as to the liability and
22 the damages of the case;

1 xxx. Magued Beshay MD of Facey who may testify as to the liability and
2 the damages of the case;

3 yyy. Dharmesh Patel of Facey who may testify as to the liability and the
4 damages of the case;

5 zzz. David Shaw MD of Facey who may testify as to the liability and the
6 damages of the case;

7
8 aaaa. Youssef Youssef MD of Facey who may testify as to the liability
9 and the damages of the case;

10 bbbb. Kevin Vuong MD of Facey who may testify as to the liability and
11 the damages of the case;

12 cccc. Meredith R D'Anna RN of PHCMC who may testify as to the
13 liability and the damages of the case;

14 dddd. Jamie A Diaz MD of PHCMC who may testify as to the liability and
15 the damages of the case;

16 eeee. Barry Wilen MD of PHCMC who may testify as to the liability and
17 the damages of the case;

18 ffff. Jong Lee MD of Facey who may testify as to the liability and the
19 damages of the case;

20 gggg. Daniel Brison MD of Facey who may testify as to the liability and
21 the damages of the case;

22 hhhh. Colin W Stokol MD of Cedars Sinai who may testify as to the
23 liability and the damages of the case;

1 iiii. Defendant's persons most knowledgeable regarding the design and
2 operation of PVA 350;

3 jjjj. Defendant's persons most knowledgeable regarding the chemicals
4 that were going to be sprayed by the PVA 350 at issue;

5
6 **Plaintiff has learned by reviewing documents during discovery that the**
7 **following additional witnesses may have information related to Plaintiffs' claims,**
8 **PVA's products, and/or SpaceX.**

9 1. **Jose Vasquez**

10 Address: 8922 Nogal Avenue, Whittier, CA.

11 Mr. Vasquez is a former SpaceX electronic technician.

12 2. **Precision Valve & Automation, Inc. ("PVA"):**

13 **Witnesses:** Frank Hart, Sales Manager; Jeff Van Norden, Engineering Manager;
14 Jon Connelly, Rework Sales Manager; Alex Duggan, Project Engineer; Mark Kniese,
15 Controls Engineer; Andrew Haraburda, Customer Service Tech; Michael Leonard,
16 Customer Service Tech; Richard Bievenue; Rex Ellis; Chris Evans; David Filbert;
17 David Gomez; Rodrigo Gutierrez; Gavin Matupang and Jon Urquhart.

18 3. **Space Exploration Technologies Corp. ("SpaceX"):**

19 Address and telephone number: 1 Rocket Road, Hawthorne, CA 90250 (310)
20 363-6000.

21 **Witnesses:** Francisco whose last name is unknown, Juan whose last name is
22 unknown, Scott Alberta, Jose Bernabe, Edwin Chiu, David DiDomenico, Antonio
23 Figueroa, David Hwang, Heather Lord, Jane Malabug, Art Geitler, Brian Ignaut,
24
25
26
27
28

1 Andrea Jarrett, Mike Lynch, Gregory Maxwell, Due Phan, Diane Prins, Adam Protano,
2 John Pena, Pascale Roux, Marsha Thompson, Juan Sotelo, and Nicholas Wong.

3 **4. Express Manufacturing. Inc. ("EMI"):**

4 Address and telephone number: 3519 West Warner Avenue, Santa Ana, CA
5 92704, (714) 979-2228.

6 **Witnesses:** Dong Nguyen, Vincent Dones.

7 **8. Restronics Southern California:**

9 Address and telephone number: 27128 Paseo Espada B603, San Juan Capistrano,
10 CA 92675, (949) 394-2720.

11 **Witness:** Bill Bums.

12 **6. Ever Garcia**

13 Mr. Garcia's phone number is (661) 310-6173. Mr. Garcia is the Plaintiff's
14 friend who may testify as to the liability and the damages of the case.

15 **7. Eduardo Soto**

16 Mr. Soto's phone number is (818) 486-1617. Soto is Plaintiff's nephew who
17 may testify as to the liability and the damages of the case.

18 **8. Linda Soto**

19 Ms. Soto's phone number is (818) 205-4934. She is Eduardo Soto's wife.

20 Ms. Soto may testify as to the liability and the damage of the case.

21 **9. Sheila Tai, MD of Facey**

22 Dr. Tai may testify as to the liability and the damages of the case;

23 **10. Batah Jihad, MD of Facey**

24 Dr. Jihad may testify as to the liability and the damages of the case;

1 **11. Navid Eghbalieh, MD of Facey**

2 Dr. Eghbalieh may testify as to the liability and the damages of the case;

3 **12. Doris Cardenas, MD of Facey**

4 Dr. Dr. Cardenas may testify as to the liability and the damages of the case;

5 **13. Jackie Swanson, MD of Facey**

6 Dr. Swanson may testify as to the liability and the damages of the case;

7 **14. Henry Shih, MD of Providence Holy Cross Medical Center**

8 Dr. Shih may testify as to the liability and the damages of the case;

9 **15. Helen Palatinus, MD of Cedar Sinai Medical Center**

10 Dr. Palatinus may testify as to the liability and the damages of the case;

11 **16. John Yamashita, MD of Providence Holy Cross Medical Center**

12 Dr. Yamashita may testify as to the liability and the damages of the case;

13 **17. Joseph Tang, MD**

14 Dr. Tang may testify as to the liability and the damages of the case;

15 **18. Vincent Fennell, MD**

16 Dr. Fennell may testify as to the liability and the damages of the case;

17 **19. Grace Juarez, MD**

18 Dr. Juarez may testify as to the liability and the damages of the case;

19 **20. Aylin Selek, MD of Cedar Sinai**

20 Dr. Selek may testify as to the liability and the damages of the case;

21 **21. Marc Makhani, MD of Cedar Sinai**

22 Dr. Makhani may testify as to the liability and the damages of the case;

23 **22. Daniel Hoh Kayun, MD of Cedar Sinai**

1 Dr. Kayun may testify as to the liability and the damages of the case;

2 **23. Katherine Haker, MD of Cedar Sinai**

3 Dr. Haker may testify as to the liability and the damages of the case;

4 **24. Deepti Dhall, MD of Cedar Sinai**

5 Dr. Dhall may testify as to the liability and the damages of the case;

6 **25. Alfonso Jackie, RN of Cedar Sinai**

7 Mr. Jackie may testify as to the liability and the damages of the case;

8 **26. Josue M. Reyes, RN of Cedar Sinai**

9 Ms. Reyes may testify as to the liability and the damages of the case;

10 **27. Lorisa Raya, RN of Cedar Sinai**

11 Ms. Raya may testify as to the liability and the damages of the case;

12 **28. Laura Olivas of Cedar Sinai**

13 Ms. Olivas may testify as to the liability and the damages of the case;

14 **29. Shawn Rudolph, EMT**

15 Mr. Rudolph may testify as to the liability and the damages of the case;

16 **30. Jose Paz, EMT**

17 Mr. Paz may testify as to the liability and the damages of the case;

18 **31. David Alessi**

19 Mr. Alessi may testify as to the liability and the damages of the case.

20 Relevant information regarding this case may also be learned from numerous
21 other PVA and SpaceX employees, PVA retained experts. Plaintiffs have not identified
22 all relevant witnesses regarding this lawsuit including any witnesses PVA may identify
23
24
25
26
27
28

1 in their Rule 26 Disclosures and supplemental disclosures and reserves its right to
2 supplement this disclosure in accordance with Fed. R. Civ. P. Rule 26(e).

3 **FRCP 26(a)(1)(A)(ii) - A copy - or a description by category and location - of**
4 **all documents, electronically stored information, and tangible things that the**
5 **disclosing party has in its possession, custody, or control and may use to support**
6 **its claims or defenses, unless the use would be solely for impeachment.**
7

8 Pursuant to FRCP 26(a)(1)(A)(ii) Plaintiffs have previously identified the
9 following:

10 **Documents:**

- 11 a. Plaintiff Ruben Juarez's medical records and billing records
12 b. PVA 350 and PVA 650 specifications;
13 c. MSDS sheets;
14 d. Photos of Plaintiffs;
15 e. Plane tickets and trip protection of Plaintiff Isela Hernandez and their
16 daughter;
17 f. Emails of Plaintiff Ruben Juarez;
18 g. W2 of Plaintiff Ruben Juarez 2012-2014.

19
20
21 **Plaintiff has learned by reviewing documents during discovery that the**
22 **following additional documents may be relevant to Plaintiffs' claims, PVA's**
23 **products, and/or SpaceX.**

24 Documents produced in discovery by PVA bates stamp numbers PVA0001-
25 4481. Said production includes, among other documents, product-related documents,
26 sales-related documents, engineering and design documents, design and operation
27
28

1 manuals, operation and maintenance manuals, emails, and other written and electronic
2 communications.

3 Documents and recording produced in discovery by SpaceX on June 25, 2018
4 including documents with bates stamp numbers Juarez v. PVA 1000 – 2170
5

6 **Damages computation and supporting documents:**

7 a. Plaintiff Ruben Juarez claims past and future medical costs, past and
8 future wage loss, and pain and suffering. Plaintiff Isela Hernandez claims loss of
9 consortium. The supporting documents will be produced.

10 Plaintiffs retain the right to supplement the disclosure with information learned
11 through discovery.
12

13
14 DATED: July 10, 2018

BALABAN & SPIELBERGER, LLP

15
16 /s/ Kahren Harutyunyan

17 Daniel K. Balaban

18 Andrew J. Spielberger

19 Kahren Harutyunyan

20 Attorneys for Plaintiffs
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

STATE OF CALIFORNIA

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 11999 San Vicente Boulevard, Suite 345 Los Angeles, CA 90049.

On July 10, 2018, I served the foregoing documents described as: **PLAINTIFFS' SUPPLEMENTAL DISCLOSURES PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 26(A)(1) AND 26(E)1** on the interested parties in this action.

(See Attached Service List)

☐ By placing the true copies thereof enclosed in sealed envelopes addresses as stated on the attached mailing list.

☐ **BY MAIL**

☐ As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ **BY ELECTRONIC TRANSMISSION:** Based on a court order or an agreement of the parties to accept service by electronic transmission, I hereby certify that a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Courts system.

☐ **BY OVERNIGHT DELIVERY:**

☒ **BY ELECTRONIC MAIL** to: see attached service list

☐ **BY PERSONAL SERVICE** - I caused to be delivered such envelope by hand per the service list attached.

☐ **BY FACSIMILE** - I faxed a copy of the above-described document to the interested parties as set forth on the attached mailing list.

Executed on July 10, 2018 at Los Angeles, California.

☒ **(Federal)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Kahren Harutyunyan
Name

/s/ Kahren Harutyunyan
Signature

SERVICE LIST

RUBEN JUAREZ , ET AL. v. PRECISION VALVE & AUTOMATION, ET AL.
CASE NO. 2:17-cv-03342

Shahrad Milanfar (SBN 201126)
smilanfar@bkscal.com

Alex P. Catalona (SBN 200901)
acatalona@bkscal.com

BECHERER KANNETT & SCHWEITZER
1255 Powell Street
Emeryville, CA 94608
Telephone: (510) 658-3600
Facsimile: (510) 658-1151

BALABAN & SPIELBERGER LLP
11999 SAN VICENTE BOULEVARD, SUITE 345
LOS ANGELES, CALIFORNIA 90049